

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
CHARLOTTESVILLE DIVISION

CYNTHIA B. SCOTT, <i>et al.</i> ,	)	
	)	
<i>Plaintiffs,</i>	)	
	)	Case No. 3:12-cv-00036-NKM
v.	)	Sr. Judge Norman K. Moon
	)	
HAROLD W. CLARKE, <i>et al.</i> ,	)	
	)	
<i>Defendants.</i>	)	
	)	

**DECLARATION OF JOYCE REYNOLDS**

1. My name is Joyce Reynolds. I am a 45-year-old woman and am incarcerated at the Fluvanna Correctional Center for Women ("FCCW"). I have personal knowledge of the facts in this declaration.
2. I have been at FCCW since November 2017, and my projected release date is in now between July and August 2022 due to the new earned sentence credit law. I currently reside in unit 5.
3. On around March 7, 2022 I was in the waiting room of the clinic in Building 2, for a sick call appointment. I saw signs posted on the walls and windows. The sign was also on the front of the desk in the exam room. The sign threatened a disciplinary charge if anyone brought up a problem that was not the reason for the appointment.
4. The sick call appointment on March 7<sup>th</sup> was for my blood pressure and diabetes. However, I was also experiencing pain in my hands and legs. I thought it might be nerve pain that is a complication of diabetes. When I tried to bring this up, I was told by Nurse Casen that I couldn't talk about things not written on my sick call. She also told me that the next time I did, she would give me a disciplinary charge.

5. Even though we can write up to three issues on a sick call, providers never address all three. They only address the first one, or the one they think is most important. Then they don't get to the rest of the issues.
6. I recently had an appointment with Nurse Casen about the pain I have in my legs. I have spinal stenosis, and I've been in a wheelchair for over 6 months because of the pain. I tried to tell Nurse Casen that the pain medications I was on weren't working. Nurse Casen insisted that I needed to try the medications for 6 months to see if they'll work. I told her that I knew my body, and I was in pain. Nurse Casen got upset that I was challenging her treatment decision. Because I believe that Nurse Casen's treatment of me is so bad, I told her that I would sue the DOC when I got home. Nurse Casen then told her coworker to get me out of the office. Medical staff called watch command saying that I had threatened to kill medical staff. I never threatened them. However, a sergeant stood up for me and refused to charge me, because she knew I hadn't made any threats. I am afraid to bring up my concerns during medical appointments now.
7. I don't know if this is related to the notice about medical appointments or not, but on March 3<sup>rd</sup>, I was at an outside appointment with a spine specialist. When the doctor was examining me, he asked me to squeeze his hands and asked if I had any pain. I said that I did. The doctor then referred me to a hand specialist. When I came back to FCCW, I had a follow up appointment with Nurse Casen. She was upset that I had been referred to the hand specialist, and she told me not to bring up anything other than the stated reason for my appointment at outside appointments as well. She told me that I am supposed to say no when asked by the doctor if I had any pain other than the one I'm there for. She told me that I should put in a sick call at FCCW, and then be diagnosed for it here.

8. Because of visiting restrictions due to COVID, I was unable to sign this declaration.

However, it was read to me verbatim over the phone and I have verified that it is true and correct to the best of my knowledge.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

/s/ JOYCE REYNOLDS

April 1, 2022